

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE

IN RE:

JAMES ALVIN THOMAS SR.,
1348 Gip Manning Road
Clarksville, TN 37042
SSN: XXX-XX-1833

Debtor(s).

Bk. No. **16-00333-RM3-13**
Chapter 13
Judge Randal S. Mashburn

THE DEADLINE FOR FILING A TIMELY RESPONSE IS: March 30, 2017
IF A RESPONSE IS TIMELY FILED, THE HEARING WILL BE: April 19, 2017 at 8:30 a.m. in Courtroom
1, 2nd Floor Customs House, 701 Broadway, Nashville, Tennessee 37203

TRUSTEE'S OBJECTION TO DEBTOR'S MOTION TO MODIFY PLAN

Henry E. Hildebrand, III, Standing Trustee for Chapter 13 matters in the Middle District of Tennessee, respectfully objects to the application filed by the debtor seeking to modify the plan confirmed in the above case.

A suggestion of death has been filed indicating that the debtor is not capable of funding a Chapter 13 plan. As a result, the modification is not feasible and the request to modify should be denied.

Respectfully submitted,

/s/ Henry E. Hildebrand, III

Henry E. Hildebrand, III
Chapter 13 Trustee
P. O. Box 340019
Nashville, TN 37203-0019
615-244-1101; Fax 615-242-3241
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CERTIFICATE OF SERVICE

I, the undersigned, hereby certifies that on or before the 21st day of March, 2017, a true and correct copy of the foregoing has been served in the following manner:

Email by Electronic Case Noticing to:

U. S. Trustee
Robert H. Moyer, Counsel for Debtor

By U. S. Postal Service, postage prepaid to:

Estate of James A. Thomas Sr., 1348 Gip Manning Road, Clarksville, TN 37042

/s/ Henry E. Hildebrand, III

Henry E. Hildebrand, III
Chapter 13 Trustee